REMARKS

In view of the following discussion, the Applicant submits that none of the claims now pending in the application are obvious under the provisions of 35 U.S.C. § 103. Thus, the Applicant believes that all of these claims are now in allowable form.

I. IN THE SPECIFICATION

The specification has been amended in response to the Examiner's objections to the drawings. Namely, the specification was amended to add reference numerals 365, 375 and 605 shown in the Figures 3 and 6 respectively. As such, the Applicant respectfully requests the objection be withdrawn.

II. REJECTION OF CLAIMS 1-13 UNDER 35 U.S.C. § 103

A. Claims 1-4, 7-11 and 13

The Examiner has rejected claims 1-4, 7-11 and 13 in the Office Action under 35 U.S.C. § 103 as being unpatentable over Namma et al. (US 6,185, 616, issued February 6, 2001, herein referred to as "Namma".) in view of Veerina et al. (US 6,243,379, issued June 5, 2001, herein referred to as "Veerina".) Applicant respectfully traverses the rejection.

Namma teaches a proxy server apparatus, a proxy server system, and a server apparatus. These apparatuses are used to dynamically assign an IP address to a home use computer using a PPP connection only while the computer is connected. (See Namma, Abstract.)

Veerina teaches a connection and packet level multiplexing between network links. Multiplexing over multiple single-user IP address account links is achieved by "translating" internet protocol (IP) addresses. (See Veerina, Abstract.) "Translation," as taught by Veerina, is simply utilizing an IP address look up table and substituting the IP address or port number. (See Veerina, Summary; Col. 3, Lines 39-47; Col. 4, Lines 37-44.)

The Examiner's attention is directed to the fact that Namma and Veerina (either singly and or in any permissible combination) fails to disclose the novel apparatus or method of translating a request from a format compatible with a wide area network into

a local area network compatible request. Applicant's independent claims 1 and 7 positively recite:

> 1. In a data access system, a method of providing an Internet Protocol (IP) address for a computer device, said method comprising:
> a) receiving a request from said computer device for an IP address at a subscriber side network terminal, wherein said computer is configured for operation on a wide area network, and wherein said request is in a format compatible with a wide area network;
> b) translating the request from the format compatible with a wide area network into a local area network compatible request; and
> c) obtaining an IP address for said computer device. (Emphasis added.)
>
> 7. An apparatus for providing connectivity to the Internet over a high speed access network, said apparatus comprising:
> a) a protocol stack for receiving a request from a computer device for an IP address, wherein said request is in a format compatible with a wide area network; and
> b) a translator for translating said request from said format compatible with a wide area network into a local area network compatible request. (Emphasis added.)

Applicant's invention is directed to a method and apparatus for providing an Internet Protocol (IP) address for a computer device. Namely, the Applicant's invention allows dynamic host configuration protocol (DHCP) to be utilized in an environment in which a computer would otherwise not be capable of dynamically obtaining an IP address. The Applicant achieves this by translation. In one embodiment, translation as defined by the Applicant's invention is performed by conversion of encapsulated packets in PPP format into DHCP format. (See Applicant's Specification, Page 11, Lines 20-33.) Applicant's independent claims 11 and 13 positively recite:

> 11. A method for use in a network environment for an assignment of Internet Protocol (IP) address, the method comprising:
> a) establishing a local Point-to-Point Protocol (PPP) session between a computer device and a local network interface device to acquire an IP address for the computer device;
> b) using a Dynamic Host Configuration Protocol (DHCP) between the local network interface device and a remote server to acquire the IP address; and
> c) relaying said IP address to the computer device using a PPP-based message. (Emphasis Added.)
>
> 13. A proxy method for a universal access mechanism to a broadband access system, the method comprising:

a) requesting a connection to a broadband access network through a network interface device from a Local Area Network (LAN) – attached device;
b) establishing a Point-to-Point Protocol Over Ethernet (PPPoE) connection to an access server connected to said broadband access network;
c) performing protocol encapsulation and de-encapsulation for relaying messages transmitted between the broadband access network and the LAN-attached device for the duration of the PPPoE connection. (Emphasis Added.)

In contrast, Namma simply does not teach or suggest the novel concept of translating a request from a format compatible with a wide area network into a local area network compatible request. This fact was conceded by the Examiner. However, the Examiner then alleges that Veerina bridges the significant gap left by Namma. (See Veerina, Summary; Col. 3, Lines 39-47; Col. 4, Lines 37-44.) The Applicant respectfully disagrees and submits that the Examiner has interpreted Veerina too broadly.

The Applicant submits that the Examiner has interpreted the "translation" taught by Veerina too broadly. The Applicant respectfully asserts that the "translation" taught in Veerina is clearly not the same as the translation taught by the Applicant's invention. Veerina is merely substituting IP addresses based on a comparison with IP address look up table. (See Veerina, Summary; Col. 3, Lines 39-47; Col. 4, Lines 37-44.) In contrast, the Applicant's invention teaches a format translation. For example, translation in the Applicant's invention involves conversion of encapsulated packets in PPP format into DHCP format. (See Applicant's Specification, Page 11, Lines 20-33.) Veerina fails to teach, show or suggest format translation as defined by the Applicant's invention.

In arguendo, even if Namma and Veerina were combined, the combination would still not teach or suggest Applicant's invention. The combination of Namma and Veerina would only teach a method and system of dynamically assigning IP addresses to multiple single-user IP address account links by multiplexing; wherein multiplexing is achieved by substituting IP addresses using an IP address look up table. Therefore, the combination of Namma and Veerina does not teach or suggest Applicant's invention as recited in independent claims 1, 7, 11 and 13.

Dependent claims 2-4 and 8-10 depend from independent claims 1 and 7, respectively, and recite additional limitations. As such, and for the exact same reason

set forth above, the Applicant submits that claims 2-4 and 8-10 are also not made obvious by the teachings of Namma and Veerina. As such, the Applicant respectfully requests the rejection be withdrawn.

B. Claims 5, 6 and 12

The Examiner has rejected claims 5, 6 and 12 in the Office Action under 35 U.S.C. § 103 as being unpatentable over Namma in view of Veerina, and further in view of Radia et al, (US 5,848,233, issued December 8, 1998, hereinafter referred to as "Radia.") Applicant respectfully traverses the rejection.

The teachings of Namma and Veerina have been discussed above. Radia teaches a method and apparatus for dynamic packet filter assignment. IP packets are filtered based on events within a computer network. (See Radia, Abstract; Col. 7 plus.)

The Examiner's attention is directed to the fact that Namma, Veerina and Radia (either singly and or in any permissible combination) fails to disclose the novel apparatus or method of translating a request from a **format** compatible with a wide area network into a local area network compatible request, as recited by Applicant's independent claims 1 and 11. (See *supra*.)

Applicant's invention is directed to a method and apparatus for providing an Internet Protocol (IP) address for a computer device. Namely, the Applicant's invention allows dynamic host configuration protocol (DHCP) to be utilized in an environment in which a computer would otherwise not be capable of dynamically obtaining an IP address. In one embodiment, the Applicant achieves this by translating a request from a WAN format into a LAN format. Translation as defined by the Applicant's invention is performed by conversion of encapsulated packets in PPP **format** into DHCP **format**. (See Applicant's Specification, Page 11, Lines 20-33.)

In contrast, Namma and Veerina simply do not teach or suggest the novel concept of translating a request from a format compatible with a wide area network into a local area network compatible request. However, the Examiner then alleges that Radia bridges the significant gap left by Namma and Veerina. The Applicant respectfully disagrees and submits that the Examiner has interpreted Radia too broadly. Radia fails to teach, show or suggest the novel concept of translating a request from a

format compatible with a wide area network into a local area network compatible request. Radia only teaches a method and apparatus for dynamic packet filtering. (See Radia, Abstract; Col. 7 plus.)

In arguendo, even if Namma, Veerina and Radia were combined, the combination would still not teach or suggest Applicant's invention. The combination of Namma, Veerina and Radia would only teach a method and system of dynamically assigning IP addresses to multiple single-user IP address account links by multiplexing that has the ability to filter dynamic packets; wherein multiplexing is achieved by substituting IP addresses using an IP address look up table. Therefore, the combination of Namma, Veerina and Radia does not teach or suggest Applicant's invention as recited in independent claims 1 and 11.

Dependent claims 5, 6 and 12 depend from independent claims 1 and 11, respectively and recite additional limitations. As such, and for the exact same reason set forth above, the Applicant submits that claims 5, 6 and 12 are also not made obvious by the teachings of Namma, Veerina and Radia. As such, the Applicant respectfully requests the rejection be withdrawn.

Conclusion

Thus, the Applicant submits that all of these claims now fully satisfy the requirement of 35 U.S.C. §103. Consequently, the Applicant believes that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the issuance of a final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

PATENT

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Respectfully submitted,

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